

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re NAMASTE TECHNOLOGIES INC.
SECURITIES LITIGATION

) Case No.: 1:18-CV-10830-GHW
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CLASS ACTION

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Providing for Notice dated October 25, 2019, and upon (i) the Declaration of Brenda Szydlo in Support of: (I) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; (ii) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein, the Court-appointed lead plaintiffs Janita Holgate, Linda M. Rich and Minako Caddeo (collectively, "Lead Plaintiffs"), individually and on behalf of all other persons similarly situated, and additional plaintiff Willard Workman (together with Lead Plaintiffs, "Plaintiffs"), will and hereby do move this Court, before the Honorable Gregory H. Woods, on March 11, 2020 at a 10:00 a.m., in the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and

adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: February 5, 2020

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By: /s/ Jeremy A. Lieberman
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Additional Counsel

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On February 5, 2020, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 5, 2020.

/s/ Brenda Szydlo
Brenda Szydlo